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16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 JOHN P. BRINCKO, as Chapter 11 Trustee of
19 Debtor National Consumer Mortgage, LLC,

20 Plaintiff,

21 v.

22 RIO PROPERTIES INC.,

23 Defendant.
24

CASE NO.: 2:10-cv-00930-PMP-PAL

**DEFENDANT RIO PROPERTIES, INC.'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSE TO ORDER TO SHOW
CAUSE REGARDING SEALED
DOCUMENTS**

(First Request)

25 Pursuant to LR 6-1 and LR 6-2, Defendant Rio Properties, Inc. (the "Rio") hereby
26 submits this Unopposed Motion for Extension of Time to File Response to Order to Show Cause
27 Regarding Sealed Documents (the "Motion"). The Rio respectfully requests that this Court grant
28 the Rio a ten (10) day extension to file a response to the Order to Show Cause entered by the

1 Court on May 8, 2014 (Dkt. No. 390) (the "OSC"). The Rio has received confirmation from
2 counsel for Plaintiff John P. Brincko, as Chapter 11 Trustee of Debtor National Consumer
3 Mortgage, Inc. (the "Trustee"), that the Trustee does not oppose the Rio's Motion.

4 By its Order, the Court required the Rio and the Trustee to "show cause, in writing no
5 later than June 6, 2014, why each of the sealed filings in this case should not be unsealed", and
6 further required the parties to provide a redacted copy of any document for which the Rio and/or
7 the Trustee sought to seal only a portion of the document. *See* OSC, at 2:6-9.

8 This case involved the filing of hundreds of pleadings and records, including thousands
9 of pages of exhibits thereto, as well as the presentation of hundreds of multiple-page trial
10 exhibits. Many of these documents and exhibits were initially filed under seal *in toto*. The Rio
11 is making a diligent review of all documents and exhibits that were filed with this Court, as well
12 as those that were filed originally with the United States Bankruptcy Court for the Central
13 District of California, to ensure that all documents for which the Rio believes a justification for
14 retaining the sealed filing of a document or exhibit—in whole or in part—are properly identified
15 in the Rio's response to the OSC. In particular, the Rio is aware that multiple documents contain
16 information that is subject to this Court's Special Order No. 108. The Rio must prepare a
17 redacted copy of the document that properly protects private individual information pursuant to
18 Special Order No. 108, and present the redacted substitute document in compliance with the
19 OSC. The Rio needs a short additional time period in which to ensure that it has completed its
20 review of all of these documents and exhibits, and has prepared a thorough response to the OSC.

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1 Thus, the Rio respectfully requests that this Court provide a ten (10) day extension—
2 through and including June 16, 2014—for the Rio to prepare and submit its response to the OSC.

3 DATED this 6th day of June, 2014.

4 **COTTON, DRIGGS, WALCH,**
5 **HOLLEY, WOLOSON & THOMPSON**

6 */s/ James D. Boyle*

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20 *Attorneys for Defendant Rio Properties, Inc.*

21 IT IS SO ORDERED:

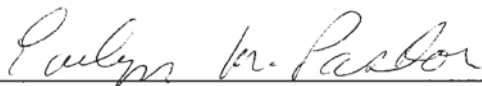
22 
23 UNITED STATES DISTRICT JUDGE

24 June 9, 2014
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that on the 6th day of June, 2014, I caused the document entitled **DEFENDANT RIO PROPERTIES, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO ORDER TO SHOW CAUSE REGARDING SEALED DOCUMENTS**, to be served as follows:

Attorneys of Record	Parties Represented	Method of Service
John R. Bailey, Esq. Dennis L. Kennedy, Esq. BAILEY KENNEDY LLP 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148	John P. Brincko <i>Chapter 11</i> <i>Trustee of Debtor</i> <i>National</i> <i>Consumer</i> <i>Mortgage LLC</i>	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Mail Service
Bijan Amini, Esq. Lita Beth Wright, Esq. Noam Besdin, Esq. STORCH AMINI & MUNVES P.C. 140 East 45 th Street New York, New York 10017 <i>Admitted Pro Hac Vice</i>	John P. Brincko <i>Chapter 11</i> <i>Trustee of Debtor</i> <i>National</i> <i>Consumer</i> <i>Mortgage LLC</i>	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Mail Service


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 Woloson & Thompson